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June 13, 2023

Chambers of Hon. Robert B. Kugler
United States District Court for the District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th and Cooper Streets
Camden, New Jersey 08101

Special Master the Honorable Thomas Vanaskie
Stevens & Lee
1500 Market Street, East Tower
18th Floor
Philadelphia, PA 19103

RE: *In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation*
United States District Court for the District of New Jersey, Case No. : 1:19-md-2875

Dear Judge Kugler and Special Master Vanaskie:

On behalf of Defendants Albertson's LLC, CVS Pharmacy, Inc., Express Scripts, Inc., Humana Pharmacy, Inc., Kroger Co., OptumRX, Rite Aid Corp., Walgreen Co., and Walmart Inc. (collectively, the "Retail Pharmacy Defendants"), please find enclosed a proposed Amended Order regarding HIPAA compliance as discussed on the record at the Case Management Conference held on June 7, 2023.

Plaintiffs' counsel has reviewed the proposed order and consents to its submission.

Thank you once again for your consideration of these issues.

Respectfully submitted,

A handwritten signature in blue ink that reads "Kara Kapke".
Kara Kapke